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Universal Protection Service, LLC

9 UNITED STATES DISTRICT COURT
10 DISTRICT OF NEVADA

11 NEBYOU SOLOMON,

12 Plaintiff,

13 vs.

14 LAS VEGAS METROPOLITAN
POLICE DEPARTMENT; JOSEPH
15 LOMBARDO, individually and his
official capacity as Sheriff; JOHN L.
16 PELLETIER, an individual; RICHARD
E. MAUPIN, an individual; RYAN J.
17 FRYMAN, an individual; JUAN D.
CONTRERAS, an individual; ALLEN
18 J. PAVESE, an individual; BRANDON
M. MEADS, an individual; FASHION
19 SHOW MALL, LLC, a Nevada limited-
liability company; UNIVERSAL
20 PROTECTION SERVICE, LLC, a
Nevada limited-liability company;
21 DOE SECURITY GUARDS I – III,
22 and individuals,
23

24 Defendants.

Case No.: 2:19-cv-00652-JAD-DJA

**STIPULATION AND ORDER TO
EXTEND DEADLINE TO FILE
DEFENDANT UPS'S REPLY TO
PLAINTIFF'S OPPOSITION TO
DEFENDANT UNIVERSAL
PROTECTION SERVICE, LLC'S
MOTION FOR JUDGMENT ON
THE PLEADINGS (ECF NO. 39)**

(FIRST REQUEST)

25 Pursuant to LR IA 6-1, Plaintiff NEBYOU SOLOMON ("Plaintiff") and
26 Defendant UNIVERSAL PROTECTION SERVICE, LLC ("Defendant UPS"), by
27 and through their respective counsel, hereby stipulate and request that this Court
28 extend the deadline to file Defendant UPS's Reply to Plaintiff's Opposition to

Defendant Universal Protection Service, LLC's Motion for Judgment on the Pleadings (ECF No. 39) ("Reply"), by an additional fourteen (14) days, **extending the Reply deadline from November 27, 2019 to December 11, 2019**. Plaintiff's Opposition to Defendant Universal Protection Service, LLC's Motion for Judgment on the Pleadings (ECF No. 39) ("Opposition") was filed on November 20, 2019. This is the first stipulation for extension of time for Defendant UPS to file its Reply.

This request for an extension of time is not sought for any improper purpose or other purpose of delay. This request for extension is based upon the following: Counsel for Defendant UPS initiated this request due to its scheduling conflicts limiting its ability to timely respond to Plaintiff's Opposition.

WHEREFORE, the parties respectfully request that this Court extend the deadline to file Defendant UPS's Reply from November 27, 2019 to December 11, 2019.

IT IS SO STIPULATED.

Dated: November 27, 2019

McLETCHIE LAW

/s/ Margaret A. McLetchie
Margaret A. McLetchie, Esq.
701 E. Bridger Ave., Suite 520
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Attorneys for Plaintiff

Dated: November 27, 2019

WEINBERG, WHEELER, HUDGINS,
GUNN & DIAL, LLC

/s/ Jeremy R. Alberts
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Universal Protection Service, LLC

ORDER

IT IS SO ORDERED that the deadline for Defendant UPS to file its Reply to Plaintiff's Opposition to Defendant Universal Protection Service, LLC's Motion for Judgment on the Pleadings (ECF No. 39) be extended from November 27, 2019 to December 11, 2019.

Dated: December 2, 2019.


UNITED STATES DISTRICT JUDGE

Respectfully submitted by:

WEINBERG, WHEELER, HUDGINS,
GUNN & DIAL, LLC

/s/ Jeremy R. Alberts

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